

Terry Scannell (OSB No. 853220)
terry@scannellaw.com
Christopher E. Hayes (OSB No. 093777)
chris@scannellaw.com
SCANNELLAW, LLC
7307 SW Beveland St., 200
Tigard, Oregon 97223
(503) 776-0806
Of Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

LARRY BALCOM, an individual, by and
through his attorney-in-fact, and **MARY**
BARNES, attorney-in-fact for Larry Balcom,

Plaintiffs,

v.

CLINTON PETERSON and **APRIL**
PETERSON, a married couple, and
FORECLOSURE HELP, L.L.C., an
Idaho Limited Liability Company,
TRUSTED HOME OFFER, L.L.C., an
Idaho Limited Liability Company, and
JOHN & JANE DOES 1-5,

Defendants.

Case No: 3:23-cv-00528-SB

**DECLARATION OF STEPHEN GAZDA IN
SUPPORT OF PLAINTIFFS' MOTION TO
COMPEL AND FOR SANCTIONS AND
MOTION TO VACATE PROTECTIVE
ORDER**

Oral Argument Requested

I, Stephen Gazda, being first duly sworn, depose and say:

1. I am a paralegal at Scannellaw, LLC. I am over the age of 18 and have knowledge of the facts stated herein and I am competent to testify concerning the same. The following information is provided in support of Plaintiffs Larry Balcom and Mary Barnes' Motion to Compel and for Sanctions and Motion to Vacate Protective Order.

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**PAGE 1 – DECLARATION OF STEPHEN GAZDA IN SUPPORT OF PLAINTIFFS'
MOTION TO COMPEL AND FOR SANCTIONS AND MOTION TO VACATE
PROTECTIVE ORDER**

2. I personally analyzed the Foreclosure Help, LLC bank statements produced on September 29, 2023, and December 29, 2023, and noted material differences between the two purported identical sets of bank statements.

3. I personally analyzed the Trusted Home Offer LLC bank statements produced on May 23, 2024, and found similar discrepancies.

4. I noted transfers from the Foreclosure Help LLC account ending in 4804 to seven other linked accounts ending in 1663, 4247, 9921, 9895, 2302, 1071, and 9942.

5. In reviewing 26 months of Foreclosure Help and Trusted Home Offer bank statements, I identified 28 entries designated as “ACH Withdrawal BARCLAYCARDUS-CREDITCARD” totaling \$522,490.33 in outgoing payments.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Dated: June 10, 2024

/s/ Stephen Gazda
Terry Scannell (OSB #853220)
terry@scannellaw.com
Christopher E. Hayes (OSB #093777)
chris@scannellaw.com
SCANNELLAW, LLC
7307 SW Beveland St., Ste 200
Tigard, Oregon 97223
(503) 776-0806
Of Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing on the persons listed below and that it was sent via the US Postal Service pre-paid to them at their address of record, and their name and address as listed below and by e-mail.

April & Clinton Peterson
1775 W State Street
Boise, ID 83702
april@208prestige.com
clintonwpeterson@gmail.com
Defendants

April & Clinton Peterson
1775 W State Street, #275
Boise, ID 83702
april@208prestige.com
clintonwpeterson@gmail.com
Defendants

Clinton Peterson, Registered Agent
c/o Foreclosure Help, LLC
1775 W State Street, #275
Boise, ID 83702
clintonwpeterson@gmail.com

Clinton Peterson, Registered Agent
c/o Trusted Home Offer, LLC
1775 W State Street, #275
Boise, ID 83702
clintonwpeterson@gmail.com

DATED: June 10, 2024

/s/Terry Scannell

Terry Scannell, OSB #853220
terry@scannellaw.com
Christopher E. Hayes, OSB #093777
chris@scannellaw.com
SCANNELLAW, LLC
7307 SW Beveland St. Ste 200
Tigard, OR 97223
(503) 789-6866
Of Attorneys for Plaintiffs